

3. Undersigned counsel for the Department of Justice therefore requests a stay of proceedings until Congress has restored appropriations to the Department.

4. If this motion for a stay is granted, undersigned counsel will notify the Court as soon as Congress has appropriated funds for the Department. The Government requests that, at that point, all current deadlines for the parties be extended commensurate with the duration of the lapse in appropriations.

5. Opposing counsel state that they oppose the motion to stay the case. Counsel for the Little Sisters did not have an opportunity to provide their position in the short time afforded for Government counsel to prepare and file this motion in light of the lapse in appropriations.

6. In the alternative, the Government seeks an extension of the deadline to answer or otherwise respond to the amended complaint, from December 28, 2018 until February 28, 2019.

7. An extension is appropriate to enable the Government to account for the Court's resolution of the pending preliminary injunction motion, and to account for undersigned's other work obligations, which at this point include a trial in early February as well as three significant briefs due in the first half of February.

8. Counsel for plaintiffs does not oppose the requested extension of the answer deadline. Counsel for the Little Sisters consents to the request.

Therefore, although we greatly regret any disruption caused to the Court and the other litigants, the Government hereby moves for a stay of proceedings in this case until Department of Justice attorneys are permitted to resume their usual civil litigation functions. In the alternative, the Government seeks an extension of the deadline to answer or otherwise respond to the amended complaint, from December 28, 2018 until February 28, 2019.

DATED: December 26, 2018

Respectfully submitted,

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Assistant Attorney General

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/s/ Justin M. Sandberg
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CERTIFICATE OF SERVICE

I hereby certify that, on December 26, 2018, a copy of the forgoing document was electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

DATED this 26th day of February, 2018.

s/ Justin M. Sandberg
JUSTIN M. SANDBERG
Senior Trial Counsel
United States Department of Justice